



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, S.W.
Washington, DC 20590-0001

RE: Docket Number FAA-2000-8490 -5

To whom it may concern:

In response to the Notice of Proposed Rulemaking (NPRM) calling for the expanded implementation of Reduced Vertical Separation Minimum (RVSM) airspace in the West Atlantic Route System (WATRS), the Aircraft Owners and Pilots Association (AOPA) respectfully submits the following comments on behalf of its 365,000 members nationwide. Although this evolutionary step in air traffic management offers the promise of capacity enhancements and reduced traffic delays, it is important to consider the cumulative impact such procedures could have on non-participating aircraft operating within the United States.

While not typically considered a general aviation issue, RVSM has the potential to impact international corporate operators utilizing the West Atlantic Route System. AOPA understands the need for sophisticated equipment, training, and certification requirements to insure the highest level of safety possible, however, the introduction of exclusionary airspace carries with it the potential to improve service to participating users at the expense of non-RVSM operators.

As a practical matter, procedures such as the WATRS RVSM will likely have minimal short-term repercussions. However, with the inevitable growth of system-wide capacity issues, AOPA is concerned that RVSM procedures, and with them new equipment mandates and certification processes, will reduce the access afforded to some operators if implemented domestically within the United States. In addition, the existence of exclusionary airspace creates the potential for traffic compression at lower altitudes, reducing service to other airspace users.

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In short, AOPA appreciates the need to address the continued traffic growth within the national airspace system, but cautions that such procedures must be viewed with an eye toward systemic impact. AOPA asks that advances in air traffic management, such as RVSM, be evaluated not only for their potential benefit to a particular segment of the aeronautical community, but to all airspace users. Your continued awareness of these concerns is greatly appreciated, and we thank you for the opportunity to comment.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael W. Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael W. Brown
Associate Director, Air Traffic Services
Aircraft Owners and Pilots Association